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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AIRTECH INTERNATIONAL INC.,

Plaintiff,

v.

BYUNG CHAN YIM A/K/A ROY YIM,
HYO SUN KIM, ASSURED COMPONENTS
LLC,
SENSA TECHNETICS LLC, GENUINE
AVIATION LLC, RFWAVE LAB INC.,
ARC-TECH INC., HANS AEROSPACE
INC., JOHN DOES 1-10, AND XYZ CO. 1-10,

Defendants.

Civil Action No. 22-00668-MEF-AME

**NOTICE OF MOTION TO AMEND
AND SUPPLEMENT THE FIRST
AMENDED AND SUPPLEMENTAL
COMPLAINT AND TO JOIN
ADDITIONAL PARTIES
DEFENDANT**

FILED UNDER SEAL

**MOTION DAY:
DECEMBER 16, 2024**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE THAT Plaintiff Airtech International, Inc.'s ("Airtech" or "Plaintiff"), by and through its counsel CHO LAW GROUP, LLC, pursuant to Rules 15(a)(2) and (d), and 20 of the Federal Rules of Civil Procedure, respectfully moves this Court to amend and supplement the first Amended Supplemental Complaint (DE 97), and grant joinder of additional parties defendant.

In support of this Motion, Plaintiff relies upon the pleadings and the following:

1. The Memorandum of Law in Support of Plaintiff's Motion to Amend and Supplement the First Amended and Supplemental Complaint, and to Join Additional Parties Defendant;
2. The Declaration of Kenneth K. Cho, Esq. dated Nov. 21, 2024 and the exhibits annexed thereto;
3. The Declaration of Amy Taylor dated Aug. 24, 2024, and the exhibits annexed thereto;
4. The Proposed Order to Amend and Supplement the First Amended and Supplemental Complaint, and to Join Additional Parties Defendant; and
5. All prior pleadings and proceedings had herein and exhibits to support this motion, reply filed hereafter or presented at any hearing on this motion.

WHEREFORE, Plaintiff respectfully requests that the Court grant this Motion to Amend and Supplement the First Amended and Supplemental Complaint, and to Join Additional Parties Defendant by entering an order granting leave to Plaintiff to file the proposed Verified Second Amended and Supplemental Complaint and for such other and further relief as the Court may deem just and proper.

Motion Day: December 16, 2024

Deadline for Opposition Papers to be filed: December 2, 2024

Deadline for Reply Papers to be filed: December 9, 2024

Dated: November 21, 2024

Respectfully submitted,

CHO LAW GROUP, LLC

By: /s/ Kenneth K. Cho
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